

**FILED**  
4/28/2024  
JCM  
THOMAS G. BRUTON  
CLERK, U.S. DISTRICT COURT

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS**

	)	
	)	
Mary Madison	)	
<b>Plaintiff,</b>	)	<b>Case Number: 1:23-CV-16476</b>
	)	
<b>-vs-</b>	)	<b>Honorable Judge Manish S. Shah</b>
	)	
Steve Schroeder	)	
Creative Werks, LLC	)	
<b>Defendant</b>	)	

**PLAINTIFF’S RULE 11(c) MOTION**

NOW COMES the Plaintiff pursuant to Federal Rule of Civil Procedure 11, stating as follows:

1. Pursuant to Rule 11, Defendants were informed of the Rule 11 violations raised and described in detail in Docket #'s 17, 30 & 31.
2. Notice of intent to file a Rule 11(c) motion was provided by email on April 2, 2024.
3. Pursuant to Rule 11 Defendants were allowed at least twenty-one (21) days’ time to remediate the violations by either withdrawing the matter or correcting it within the prescribed timeframe set forth under Rule 11...
4. More than twenty-one (21) days have passed since notice of intent to file a Rule 11(c) had been provided to Defendants.
5. Defendants have not remediated the violations to date.
6. The first Rule 11 violation was brought to Defendants’ attention on February 13, 2024 and subsequent violations again on March 18, 2024 respectively.

7. Defendants were notified that if such corrections or withdrawals were not made within the prescribed timeframe that they should expect that anywhere on or after April 24, 2024 a Rule 11(c) motion regarding these violations would be made to the court.
8. The violations were outlined to Defendants to avoid any misunderstanding about the Rule 11 violations, in sum, the most notable violations are as follows:
  - a. Asserting a frivolous claim and defense based upon "wholly invented facts" that IDHR claims were before the court as the meritorious defense to set aside the motion for default. (Dkt #15)
  - b. The contumacious act of providing false and misleading information to the court facilitated an ill-gotten benefit of having the motion for default set aside (Dkt. 20)
  - c. Continuing to perpetuate a frivolous claim and defense in a Rule 12(c) motion based upon "wholly invented facts" that IDHR claims were before the court, after being noticed that no such claims were before the court as referenced in Dkt. #17 and 19 respectively.
  - d. The Rule 12 (c) motion filed was frivolous and improper and it was in contravention to the deadlines imposed by the Court and the Federal Rules of Civil Procedure in particular Rule 7, 8, 11 and 12(a).
9. Plaintiff hereby moves the court pursuant to Fed. R. Civ. P. 11(c) that Defendants be sanctioned for Fed. R. Civ. P. 11(b) violations.

Dated: April 27, 2024

Respectfully submitted,

/S/ Mary Madison  
Mary Madison  
9758 S Charles  
Chicago, IL 60643  
7732979569  
Mdj123197@aol.com